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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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June 14, 1993

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

Re: In the Matter of Redevelopment of Spectrum To Encourage  
~~Investment in the New Media Telecommunications~~

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Reply Comments. 3/ Since the Current Proposed Plan retains narrowband channels of 10 MHz in the 3.7-4.2 GHz band, HBO is unable to support Alcatel's Current Proposed Plan.

The Commission in its FNPRM designated five bands above 3 GHz as possible spectrum into which 2 GHz microwave users might relocate if they were to be displaced by emerging technologies. One of those bands is the 3.7-4.2 GHz band. With respect to this band, the Commission originally proposed a channelization plan consisting of channels with 400 kHz, 800 kHz, 1.6 MHz, 3.2 MHz, 5 MHz, 10 MHz and 20 MHz bandwidth and centered at various distances from the center frequencies of the satellite transponder frequencies operating in this band. In its Reply Comments, Alcatel proposed a channelization plan which maintained the same variety of channel bandwidths, but centered the channels 10 MHz from the center frequencies of the satellite transponder frequencies in the 3.7-4.2 GHz band. The Current Proposed Plan eliminates the 400 kHz-5 MHz bandwidth channels, but maintains both the 10 MHz and 20 MHz bandwidth channels.

HBO has never objected to accommodating any potentially displaced 2 GHz users in the 3.7-4.2 GHz band so long as those users require 20 MHz channel capacity as contemplated by the frequency plan currently in use in the 3.7-4.2 GHz band. The Current Proposed Plan encourages displaced 2 GHz users requiring 10 MHz of bandwidth to relocate to the 3.7-4.2 GHz band and does not spread the relocation burden among all five of the identified relocation bands as equitably as it might if the channelization plan currently employed in the 3.7-4.2 GHz band were maintained. In addition, HBO believes that the existence of 10 MHz channels in the 3.7-4.2 GHz band, as proposed by the Alcatel, is especially problematic in light of the recent move to use digital compression for satellite delivery of video programming in the 3.7-4.2 GHz band.

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While HBO appreciates Alcatel's efforts to resolve the problems with relocating 2 GHz users, it still maintains that the introduction of channels with less bandwidth than 20 MHz in the 3.7-4.2 GHz band would be harmful to existing fixed satellite users. Accordingly, HBO is opposed to the Current Proposed Plan.

Respectfully submitted,

CERTIFICATE OF SERVICE

I, Jette Ward, hereby certify that a copy of the foregoing was served this 14th day of June, 1993 by U.S. first-class mail, postage prepaid, to the following:

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